

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Joel SALMAN-Ramirez

AKA: Enrique RAMIREZ-Carranza

Defendant.

Magistrate Case No. \_\_\_\_\_


COMPLAINT FOR VIOLATION OF

Title 8, U.S.C., Section  
1324(a)(1)(A)(iv)-Inducing and  
Encouraging Illegal Alien(s)  
To Enter the United States

The undersigned complainant being duly sworn states:

On or about **June 23, 2008**, within the Southern District of California, defendant **Joel SALMAN-Ramirez AKA: Enrique RAMIREZ-Carranza**, did encourage and induce an alien, namely **Emanuel Antonio MATEOS-Urbe** with the intent to violate the immigration laws of the United States, to come to, enter and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry and residence in the United States is and will be in violation of law; in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv).

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

  
SIGNATURE OF COMPLAINANT  
Sara Esparagoza, United States Customs  
and Border Protection Enforcement Officer

Sworn to before me and subscribed in my presence, this **25th** day of **June, 2008**.

  
UNITED STATES MAGISTRATE JUDGE

**PROBABLE CAUSE STATEMENT**

The complainant states that **Emanuel Antonio MATEOS-Uribe** is a citizen of a country other than the United States; that said alien has admitted he is deportable; that his testimony is material; that it is impracticable to secure his attendance at trial by subpoena; and that he is a material witness in relation to this criminal charge and should be held or admitted to bail pursuant to Title 18, United States Code, Section 3144.

On June 23, 2008, at about 6:40 PM, **Joel SALMAN-Ramirez AKA: Enrique RAMIREZ-Carranza (Defendant)** made application for admission into the United States at the San Ysidro, California Port of Entry as the driver of a 1998 Ford Taurus. One visible male passenger accompanied Defendant. Upon inspection before a United States Customs and Border Protection (CBP) Officer, Defendant presented as his own a Form I-551(Permanent Resident Card) bearing the name Rene A Tinajero Arizpe. Defendant also presented a Permanent Resident Card bearing the name Luis S Verdin Chavira on behalf of the male passenger. Defendant gave a negative customs declaration and stated he intended to travel to San Diego, California. The CBP Officer questioned Defendant regarding ownership of the vehicle and Defendant stated the vehicle was his. The CBP Officer suspected Defendant his passenger were imposters to the documents presented and subsequently escorted the vehicle and its occupants to secondary for further inspection.

In secondary, Defendant and the male passenger were confirmed to be imposters to the documents presented. Defendant and the male passenger were both identified as citizens of Mexico without legal documents to enter the United States. The male passenger was retained as a material witness and is now identified as **Emanuel Antonio MATEOS-Uribe (Material Witness)**.

During a videotaped proceeding, Defendant was advised of his Miranda rights and elected to submit to questioning without benefit to counsel. Defendant admitted he is aware the passenger is an undocumented alien and that he purposely presented the Permanent Resident Card on his behalf, knowing the Permanent Resident Card was not rightfully issued to him. Defendant admitted he agreed to drive and deliver the vehicle with the alien passenger to an unknown location in San Diego, California in exchange for being excluded from paying the amount of \$3,000.00 USD initially asked of him, in order to be smuggled into the United States.

On a separate videotaped interview, Material Witness declared he is a citizen of Mexico without legal rights to enter the United States. Material Witness admitted Defendant handed him a paper containing information that matched the Permanent Resident Card presented on his behalf and was instructed to learn the biographical information. Material Witness admitted he agreed to pay a fee of \$4,500.00 USD to be smuggled in the United States. Material Witness admitted he intended to travel to Los Angeles, California to seek residence and employment.